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install its device when it has not received such consent, and then illegally tampers with already installed devices, such as the GateGuard intercoms, to place an “extender” inside the electronic devices belonging to others, including GateGuard, enabling Amazon to “piggy back” on the authorized access granted to parties such as GateGuard, bypassing landlords, property owners and other third-party access providers.

Key for Business is Designed so Amazon Can Dramatically and Cheaply Increase the Speed of its Deliveries, and Ultimately Control the E-Commerce Delivery Market.

~~51-50~~ Amazon’s true motivations for deploying Key for Business are to control residential building access, thereby increasing the volume and speed of its deliveries to apartment buildings and becoming an essential service through which it can ultimately control the ecommerce delivery markets.

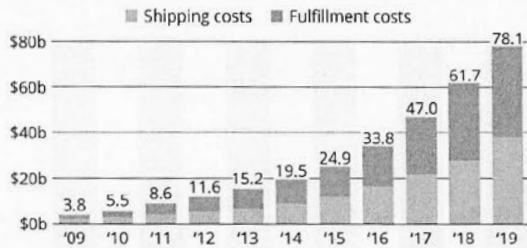
~~52-51~~ By installing its Key for Business within or on top of existing intercom/access control devices of third parties, Amazon can effectively control the e-commerce delivery market entirely. This is so because, with the priority, 24/7 access of the Amazon Key, Amazon deliveries can be made at any time, without the need to gain entry to the building from the customer, superintendent, or intercom/access controller. Other e-commerce retailers will not be able to compete with Amazon for delivery and will be forced to use Amazon’s delivery service for a fee, thus making competitors customers.

~~53-52~~ Crucially, through the Key for Business, Amazon Logistics can obtain a decisive cost advantage over competitors. The chart below shows the magnitude of escalating cost issues for Amazon (and for all delivery companies).

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Amazon's Escalating Logistics Costs

Amazon's annual shipping and fulfillment costs (in billion U.S. dollars)*



* Fulfillment costs consist of costs incurred in operating and staffing fulfillment centers, customer service centers and physical stores as well as payment processing costs
Source: Amazon.com



statista

54-53. One of the main drivers of escalating costs in the congested urban environment is a lack of parking or extended standing places in the urban environment. Deliverers are forced to spend time and gas circling buildings, attempting multiple re-deliveries or cancelling deliveries altogether and incurring customer ill-will. With the Amazon Key, deliverers can offload and deliver to a common delivery area inside the residence multiple packages in minutes.

55-54. In addition, by ensuring more rapid, reliable deliveries through its Key, Amazon can market a faster, more efficient package delivery service not only for its own products, but also for third-party deliveries. E-commerce rivals will be unable to match Amazon for speed and reliability and will be forced to use Amazon for their deliveries. With total control of the delivery market, Amazon can engage in the other anti-competitive conduct identified by the House Antitrust Report: appropriation of third-party data, self-preferencing and extraction of anti-competitive user fees. Amazon can then create a "feedback" loop to further reinforce its

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dominance of e-commerce retail, further enhancing its market power to dictate price at the expense of consumers.

56:55. With a built-out “Key” network, Amazon can offer its delivery service to Fed Ex, UPS and others as an unavoidable “last mile” delivery service, thus thwarting its competitors’ services and forcing these competitors to become its own customers.

57:56. As a result of the foregoing, Amazon has been able to double the delivery quotas imposed on its drivers, increasing the volume of deliveries from 125-150 packages a day to 300 packages in the same time period, as documented by one well-informed commentator:



ashkan.soltani
@ashk4n

Replying to @ashk4n

While these are pitched as ‘security and convenience features’, these steps are actually designed to increase revenue by reducing any idle (resting) time a delivery driver might have

Amazon drivers are paid by number of packages they deliver per ‘block’

[vice.com/en/article/m7j...](https://www.vice.com/en/article/m7j...)

“Amazon is raising the quotas. Off-peak season you had drivers delivering 120-150 packages a day. Now you’re looking at drivers being asked to deliver more than 300 packages in the same amount of time,” Adam Diaz, the director of organizing at the Warehouse Worker Resource Center, a labor organization that advocates for Amazon warehouse workers and delivery contractors in southern California, told Motherboard.

9:35 PM · Apr 12, 2021 · Twitter for Mac

58:57. As bad as the conduct by Amazon alleged above was prior to 2020, it got worse when ecommerce activity increased during the COVID-19 pandemic, as Amazon saw an opportunity to monopolize the e-commerce delivery market. Much as Amazon cloud services have become central to the Internet in such a way that natural competitors are compelled to turn to Amazon rather than develop rival technology, Amazon’s aim is to develop its delivery system so

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extensively that rivals will find it cheaper to turn to Amazon Logistics for their deliveries than to ensure such deliveries on their own.¹⁴

59.58. With a built-out access control network, Amazon can also offer its delivery service to Fed Ex, UPS and others as an unavoidable “last mile” delivery service, thus cannibalizing its competitors’ services while simultaneously forcing these competitors to become its own customers. Amazon’s ubiquitous vans and trucks provide a vivid illustration of Amazon’s dominant and growing power.

Amazon’s Patterns of Lies and Deception About its Key for Business

59. In its press release announcing the Key for Business,¹⁵ Amazon claimed that its Key for Business “allows building owners and managers to give controlled access to delivery drivers to drop off Amazon packages to their residents[.]” This press release was materially false when made because Amazon intended from the outset to bypass the property owners and deceive superintendents and managers, tricking them into believing no owner or third-party consent was necessary.

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60. In an attempt to shield itself from legal liability, Amazon has built a network of partners who approach and sign up “customers” for its Key for Business devices. Because the Amazon Key is “sold” for free, the partners responsible for directly marketing the Amazon Key can only be profitable by ensuring a huge volume of installations. This incentivizes the partners to engage in a wide variety of shady practices.

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The Amazon Key not only interferes with the functioning of existing intercom systems, thus preventing the functioning of the magnetic “door strike” that permits access to buildings, but the Amazon Key also deprives property owners and package management services of the right to control and charge a fee for access to their building. Amazon’s “free” device is actually subsidized by the property owners and package delivery companies who never learn that the Amazon Key has been installed until there is a problem with the functioning of the existing intercom system, if at all.

¹⁴ Media reports document that Amazon’s efforts have come at the expense of the health and safety of these drivers. Lauren Kaori Gurley, *Amazon Delivery Drivers Are Overwhelmed and Overworked by Covid-19 Surge*, Motherboard (July 1, 2020) <https://www.vice.com/en/article/m7j7mb/amazon-delivery-drivers-are-overwhelmed-and-overworked-by-covid-19-surge> (documenting how Amazon’s “punishing culture” and “skyrocketing quotas” “made conditions for Amazon’s roughly 75,000 delivery drivers grueling and dangerous” including by forcing drivers to violate traffic and safety laws and forego lunch and bathroom breaks to meet Amazon’s expectations). See also Patricia Callahan, *Amazon Pushes Fast Shipping but Avoids Responsibility for the Human Cost*, N.Y. Times (Sept. 5, 2019) <https://www.nytimes.com/2019/09/05/us/amazon-delivery-drivers-accidents.html> (documenting how Amazon’s “relentless push for e-commerce dominance” pressures its drivers into unsafe situations, but when accidents result, Amazon goes to great lengths to “shield itself from liability”).

¹⁵ <https://press.aboutamazon.com/news-releases/news-release-details/key-amazon-introduces-new-products-and-services-expand-its> (last accessed April 15, 2021).

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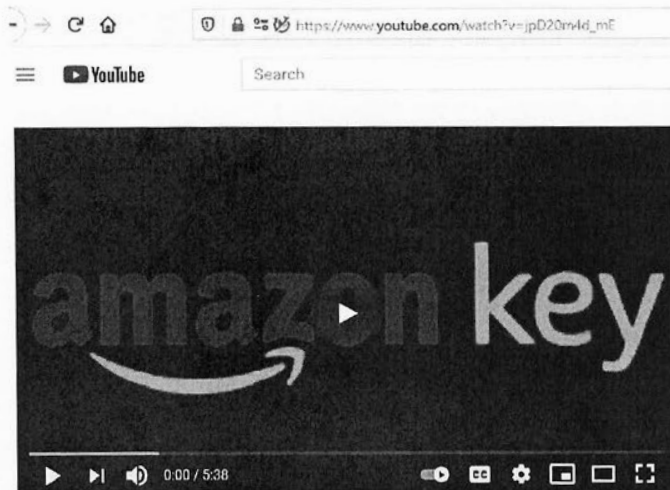
61. Promotional materials further the sales pitch that “Amazon Key for Business is completely free and perfect for apartments, gated communities, and office buildings. . . Amazon Key for Business (KFB) connects with a smart fob to let building owners and managers safely & seamlessly grant access to Amazon’s fully vetted and tracked delivery drivers.”

62. Amazon’s website¹⁶ claims that Key for Business “works seamlessly with” and “does not disrupt the existing building access system.” Amazon repeats the same claims in direct communications with prospective customers.

63. These claims are false.

64. Amazon knows these claims are false.

65. A recently posted video provides further insight into Amazon’s sales tactics:



KFB Sales Pitch Example

¹⁶ <https://www.amazon.com/b?ie=UTF8&node=18530497011> (last visited April 11, 2021).

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66. In this video,¹⁷ an individual identified as one of Amazon's "Regional Directors" explains how Amazon's sales representatives promoting KfB to building owners can leverage Amazon's prominence to gain the trust of business owners ("Amazon is a very respected business" with "such a big name").



67. In the video, Amazon sales reps are explicitly encouraged to keep their pitch as "simple" as possible so that potential targets – low level managers and superintendents – do not "get nervous" and can be tricked into signing a contract with Amazon without "feeling" the need to contact "a higher up."

68. Amazon also uses deceptive language to promote its Key for Business.

69. In written and verbal communications with prospective customers, Amazon is

¹⁷ https://www.youtube.com/watch?v=jpD20m4d_mE (last visited April 14, 2021).

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careful to characterize Key for Business as an “update” or a “necessary upgrade to [Amazon’s] delivery system.”

70. For example, the above-referenced video documents how Amazon describes KfB to building owners as a “necessary upgrade[] to [Amazon’s] delivery system.”



71. This is of course a complete lie as Amazon is not updating or upgrading any of its own delivery devices, but is interfering with, and attempting to override, the existing access devices already installed at the gate.

72. Amazon uses this deceptive language knowing few consumers will question or forgo an “update” or “upgrade” Amazon says is “necessary.”

73. In the promotional materials attached to this email Amazon insists that Key For Business is simply an update and “procedural fix,” even though it does not actually update any Amazon products.

74. Amazon also lies in its promotional materials that its product will not interfere with existing commercial access methods, deliberately pretending it will seek business owner consent for installing its devices and conflating residents’ access with the access control of third-parties controlling commercial including GateGuard, other intercom providers or the property managers

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or business owners themselves:

Amazon Key for Business is a new security update and procedural fix for delivering packages to multi-family buildings. Amazon will now use AWS cloud technology to track our packages and track our delivery drivers. Building owners and managers who participate in the update, will use this same cloud technology to control access of Amazon delivery drivers and create specific package delivery instructions for your building.

Q: Will Key for Business change the existing access experience for my residents?

A: Your residents can continue to use their existing access methods. Key for Business does not disrupt the existing building access system.

The Superintendent Bypass Strategy

75. In reality, as described above, Amazon sales reps are specifically instructed to make the sale with lower-level individuals, such as a superintendent, without seeking the consent of “higher ups,” *i.e.*, the landlord or property manager.

76.

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Amazon Falsely Claims Key for Business “Does Not Disrupt” Intercoms

76-78. In promotional materials and other documents used to promote Key for Business to consumers, Amazon falsely claims its device can be added to any existing “control system” in a “secure” manner, deliberately concealing the fact that its device interferes with and is used to disable third-party control systems.

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**Can the device be
physically hacked and
allow intruders into my
apartment building?**

**Installing Key for Business to any control system you
have is completely secure. The device is designed to
prevent physical hacking**



Building Access Controller FAQs – Security and Control



- How secure is installing another access control device in my building? Can it be physically hacked and allow intruders into my apartment building?
 - Installing "Building Access Controller" to any control system you have is completely secure. The device is designed to prevent physical hacking.

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~~77-79.~~ On its website,¹⁸ Amazon claims that Key for Business “works seamlessly with” and “does not disrupt the existing building access system.”

5. Will Key for Business change the existing access experience for my residents?

Your residents can continue to use their existing access methods. Key for Business does not disrupt the existing building access system.

~~78-80.~~ These claims are false.

~~79-81.~~ Far from “completely secure,” Amazon’s Key for Business *itself* is a serious security risk for buildings. In many instances, Amazon’s Key for Business installations interfere with or destroy a building’s primary intercom, electric door locks, and other components.

~~80-82.~~ Contrary to Amazon’s representations, by disabling or destroying the building’s primary access system, Key for Business plainly *does* “allow intruders into. . . apartment building[s]” since the device is designed to perform one function and one function only: ensure that Amazon drivers can make deliveries into buildings without resident, superintendent, property manager or third-party control or approval.

Amazon’s Relentless Hounding of Potential Customers

~~81-83.~~ In addition to its deceptive sales tactics, Amazon is relentless in pushing the installation of Key for Business. Customers report that Amazon’s representatives hound them incessantly (by phone, email, and in person)¹⁹:

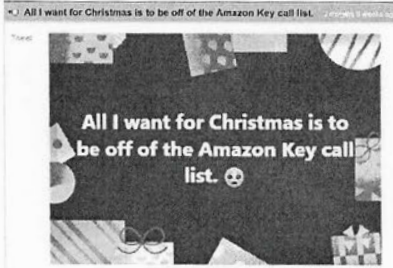
¹⁸ <https://www.amazon.com/b?ie=UTF8&node=18530497011> (last visited April 11, 2021).

¹⁹ See, e.g., <https://www.multifamilyinsiders.com/apartment-ideas/the-front-lines/17596-all-i-want-for-christmas-is-to-be-off-of-the-amazon-key-call-list> (last accessed April 15, 2021), including reports such as:

- “They’re relentless!!”
- “I’m about to get a restraining order.”
- “Omg. They are THE WORST. I can’t be more clear at this point and they continue to call. It is so annoying and disruptive.”

See also <https://www.multifamilyinsiders.com/apartment-ideas/the-front-lines/18024-any-communities-out-there-using-amazon-key-for-business-pros-cons> (last accessed April 15, 2021):

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 Zukos Mother
@ZukosMother

The amazon key for business people are relentless like
LEAVE ME ALONEEEE

Amazon Ignores Management's Instructions and Installs Key for Business Without Consent

§2-84. Unsurprisingly, Amazon's hard-ball sales tactics have been successful. Occasionally, if they have been approached at all (when the classic superintendent bypass strategy has not been adopted)-property managers begrudgingly relent and allow Amazon to install Key for Business, taken in by Amazon's lies that the device will not interfere with its existing access control system.

§3-85. Often, however, a firm "no" does not stop Amazon. When their aggressive tactics fail, Amazon sales reps proceed to the location and install Key for Business anyway — *without the property owner's consent*.²⁰ To avoid the consent of management entirely, Amazon reps are instructed to seek out and pressure lower-level employees to close a deal quickly so the nervous

- "They pressured us to get installed quickly, but none of the drivers even know what it is.... I think it's all a scam[.]"
- "Not only did nothing change but everyday we get solicited by Amazon and asked if we want this service that we already have.... [O]ur deliveries with them have gotten worse if that is possible."

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²⁰ <https://www.multifamilyinsiders.com/apartment-ideas/the-front-lines/18024-any-communities-out-there-using-amazon-key-for-business-pros-cons> (last visited April 11, 2021).

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employees will not contact “higher-ups.”

Any communities out there using Amazon Key For Business? Pros? Cons? 2 weeks 1 day ago

Tweet Amazon has been to my property numerous times attempting to sell me on Amazon Key and I kept telling them no as we have always opened our gate for delivery drivers as soon as we see them pull in. One day, our gate malfunctioned. When our control access vendor came out to look, they noticed an Amazon box was installed (Amazon Key) in our control panel. When they installed it, they ripped out a main wire which was pricey to replace. After numerous calls to Amazon, I'm still trying to get reimbursed.
The fact they did this has rubbed me the wrong way entirely as this was done without consent.

84-86. Based on the number of social media posts discussing this phenomenon, it is reasonable to infer that Amazon is systematically installing its Key for Business devices without consent.

GateGuard's Devices, Service Agreement and Terms and Conditions.

85-87. GateGuard's flagship device is an Android OS-powered intercom with face detection and recognition capability, cloud interaction and storage, video chat, 4G LTE connectivity, a router for providing wired and WiFi connectivity, NFC connectivity, data storage, and more. The device is seamlessly integrated with a website that permits landlords and property owners to track activity and usage, providing an online log of each entrance into the building and enabling clients to monitor non-primary uses, illegal sublets and the entrance of large groups. *See* <https://youtu.be/Ski0UqQZKEU>. Use of the Company's website is governed by GateGuard's Terms and Conditions that reinforce the Company's proprietary rights in its devices, intellectual property, and website. *See* <https://gateguard.xyz/legal/terms.php>.

86-88. The GateGuard AI Intercom is built around proprietary technology that includes the configuration of its motherboard, the placement and type of electronic circuitry and other components used, the insulation resistance between circuits, the voltages at which the device operates, the mechanisms of internet connectivity and the antennae used. In addition, the inner casing of the intercom, its system of wall-mounting and hinges, its waterproofing design and its

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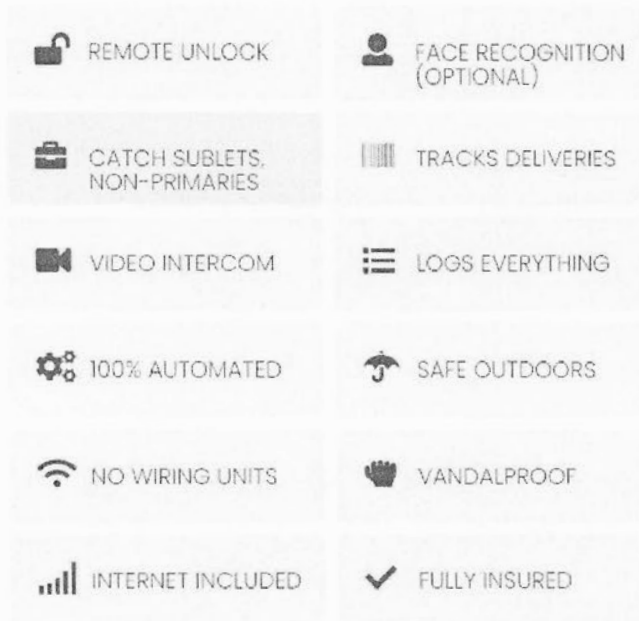
custom-designed cables are all proprietary to GateGuard and kept secret from competitors and customers, with only authorized GateGuard agents permitted access to the devices for repairs and troubleshooting. By breaking into the GateGuard “box,” a competitor such as Amazon is able to steal or damage such proprietary technology. On information and belief, Amazon is using GateGuard’s proprietary technology to develop certain Key functionalities and to develop a smart intercom of its own that will enable it to enter the smart building access control market and compete not only with GateGuard, but also with devices such as the Google Nest.

87-89. Amazon’s playbook in stealing technology from early-stage companies is well-established. See <https://www.wsj.com/articles/amazon-tech-startup-echo-bezos-alexa-investment-fund-11595520249>. In one well-documented episode, Amazon obtained access to the financials, strategic plans and other proprietary information of a company called Nucleus, and then developed an Alexa-enabled video chat device, called the Echo Show, that performed many of the same function as Nucleus’ device, leaving the Nucleus founders and other investors “furious” as “there was no way [the] small company could compete against Amazon in the consumer space.” *Id.*

88-90. The functionality of the GateGuard flagship device is shown below:

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Features



89-91. Amazon's aggressive build-out of its Key network runs headlong into companies such as GateGuard that have proprietary rights in the devices Amazon needs to exploit for its strategy to be effective. The Amazon Key is wired directly into a building's existing intercom system to give its deliverers direct access to the apartment lobby and to mask Amazon's use and misuse of existing installations.

90-92. GateGuard protects its proprietary rights in its devices through a Service Agreement and its Terms and Conditions that must be accepted by all GateGuard customers without

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exception.²¹ The Company customer acquisition model, contractual relationships and legal rights are spelled out in detail on the Company's website, www.gateguard.xyz. It is impossible to become a GateGuard customer without acknowledging the Company's Service Agreement and Terms and Conditions through the Company website.

~~91-93.~~ The Service Agreement makes clear the GateGuard customer is a "subscriber," not the owner of GateGuard installations. See Service Agreement, <https://gateguard.xyz/legal/serviceagreement.php>. Customers are required to provide a Maintenance Security Deposit for the installation of a GateGuard device. *Id.* The manufacturer's suggested retail purchase price for a GateGuard device is \$8649. Rather than selling the device, however, the Company leases its devices to the customer for a heavily discounted product fee of \$3699 plus the Maintenance Security Deposit. *Id.*

~~92-94.~~ In addition, the Company provides a "non-exclusive, non-transferable license, without the right to sublicense, to run the Product Software as incorporated into the Products during the Term solely for Subscriber's use of the Product in conjunction with any Services ordered" under the Service Agreement. *Id.* The base Subscription Fees include up to 1 GB of cellular data usage per month. Subscribers can either pay monthly fees on a sliding scale determined by the length of the contract or can prepay the total contract fees to achieve maximum savings. *Id.*

~~93-95.~~ Upon early termination of the subscription contract, the full retail cost of the device is due, much like an auto lease, where the early termination of a leased vehicle results in a charge for the full purchase price. The customer also pays a service termination fee on early termination.

²¹ Early in the Company's history, in 2017 and 2018, a handful of customers claimed, in bad faith, that they were unaware of the Company's Terms and Conditions and that they had somehow purchased devices directly from the Company without using the Company's website.

94.96. As a reflection of GateGuard’s ownership rights, the Service Agreement states that GateGuard makes “an intense effort to protect *our devices*, networks, connections, and data” (emphasis added) and provides an indemnity for GateGuard’s customers against any third-party claims that the GateGuard products or services infringe any validly registered U.S. patent, copyright or trademark.

95.97. Customers are also required to acknowledge the Company’s privacy agreement, which reflects GateGuard’s commitment to protecting the privacy rights of its customers and device users, while underscoring the Company’s proprietary rights, clearly expressed as follows: “We collect information from you when you register on our site, of via *our devices*, login via our apps, place an order, subscribe to a newsletter, respond to a survey, fill out a form, Use Live Chat, Open a Support Ticket, use our devices, or enter information on our site or devices or apps.” See <https://gateguard.xyz/legal/privacy.php> (emphasis added).

GateGuard’s Falls Prey to Amazon’s Ruthless Tactics

98. On information and belief, Amazon has installed its Key for Business devices at over 40 buildings where GateGuard was already installed, either without the property owner’s consent or by misrepresenting the effect the Amazon device would have on the GateGuard intercoms and resulting in the malfunctioning of GateGuard equipment, customer complaints, loss of revenue, and loss of goodwill. Where the Amazon Key has not caused malfunctioning, Amazon has been able to free ride on the GateGuard device, without paying a royalty or usage fee, because its conduct is secretive, hidden and deceptive.

96.99.

97.100. The consequences of Amazon’s conduct have been devastating to GateGuard. **The company has lost contracts covering over 110 buildings as a result of Amazon’s tactics.** When a

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device malfunctions at one building as a result of Amazon's actions, GateGuard loses the entire

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portfolio of buildings operated by a single manager. Thus, Amazon's conduct has a devastating multiplier effect on GateGuard's business, resulting in millions of dollars in lost revenues. In addition, where the Key has not caused malfunctioning, Amazon has been able to profit illicitly from GateGuard's brand and devices. At none of these buildings did GateGuard authorize the installation of Amazon's Key for Business into its own devices and, on information and belief, none of the installations were authorized or authorized with full disclosure. There are likely hundreds of additional buildings illegally using the Amazon Key without GateGuard's knowledge or consent.

~~98-101.~~Property managers have ~~retaliated against~~blamed GateGuard, rather than Amazon, for malfunctioning or service interruptions resulting from the Amazon Key's surreptitious installation of the Key, not knowing the full story and not considering the possibility that Amazon would operate in the ruthless and anti-competitive manner discussed herein. This has damaged GateGuard directly in its earnings as well as falsely damaged GateGuard technology's reputation in the industry.

~~99-102.~~As noted, Amazon achieves these unauthorized installations by arriving at a building and (falsely) representing to unwitting residents or building personnel that the building's management has authorized Amazon to install Key for Business. This strategy has been documented over and over, as indicated below:

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Amazon Key 4 Business

Last Monday, a couple guys buzzed my apartment saying they were from "Amazon Key." I came downstairs to the front of my building. One guy showed me a lanyard with the Amazon logo and said that they're here because we've had reports of stolen packages (which is actually true) and they'd like to install an Amazon Key device in my buzzer to allow Amazon drivers access to our building. I asked if they'd spoken to my landlord, and they claimed that they had, he was okay with this (they had his name written down on their iPad) and they just needed someone on site to authorize this. It felt fishy, but I guess because of a momentary lack of judgement or pressure, I went ahead and scheduled the appointment for the next Monday.

After the appointment I texted some friends and Googled this, and came across this article, which sounded similar to my experience. My friends also said it sounded sketchy.

<https://www.10news.com/news/local-news/new-scam-targets-local-amazon-customers-worried-about-package-thefts>

I called the phone number on my confirmation email (which was from "noreply@amazonkey4business.com", another flag) and a not-so-professional-sounding Rep answered the phone. I asked to cancel and for a confirmation email. The rep agreed, but I never received a confirmation email. I then emailed my landlord and my landlord said that someone had contacted him, but he never authorized anything and didn't want this set up.

~~100.103.~~ When representatives of one of the world's largest and best-known companies represent that they have secured authorization to install equipment, it is little surprise that building personnel and tenants often trust these representations and allow Amazon to install Key for Business.

~~101.104.~~ Amazon has followed this same "playbook" to install Key for Business at least forty buildings that utilize GateGuard's intercoms, without authorization and in a manner that intentionally or recklessly damages GateGuard's devices. The damage to GateGuard's business has a multiplier effect, as landlords who have been deceived into believing GateGuard malfunctions at one building cancel contracts covering dozens of additional buildings throughout Manhattan.

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102.105. This is not conjecture. GateGuard has specific proof that Amazon lies to building superintendents to install Key for Business inside the GateGuard intercom, as evidenced in the following dialogue between a GateGuard representative and a building superintendent:

Did anyone come to install anything? Like an Amazon device?

12:43 PM

Yes someone from Amazon did install devices.

Did someone just show up to the building and say MGMT approved?

(We are trying to understand how Amazon keeps showing up, because owners/management say nobody told them.)

1:04 PM

Amazon told me that they had approval from management to install there devices.

103.106. GateGuard contacted building management who confirmed they had *not* authorized Amazon's installation:

From: [REDACTED] >
Date: Wed, Oct 21, 2020 at 12:54 PM
Subject: Re: [REDACTED] & [REDACTED] West [REDACTED] Street
To: [REDACTED] >
Cc: [REDACTED] <[REDACTED]>, [REDACTED] <[REDACTED]>

I didn't authorize anything from Amazon. No one ever contacted me for anything from them.

104.107. Not only was the installation of Key for Business unauthorized by building management, it was *never* discussed with GateGuard, which, under its contract, has *exclusive* control over package management and access control devices on each building where it is installed. Amazon knows GateGuard has an agreement with the property manager for operation of its intercom and, as a sophisticated market participant, knows that no intercom provider would agree to allow another company to install their equipment on top of its own without consent and thus

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knows that it is intentionally interfering with GateGuards contractual relations with the property owners.

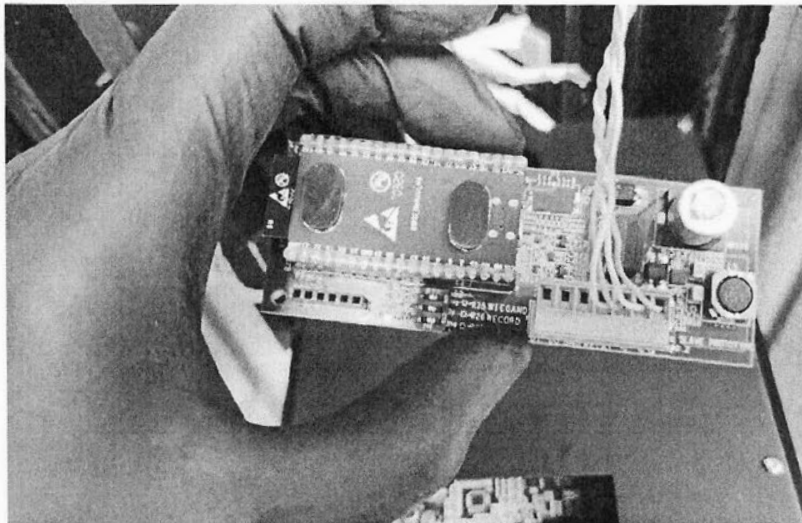
+05:108. Generally, GateGuard only learned of the installation after the client complained that the intercom – which had had no problems prior to the surreptitious insertion of the Key for Business into Gateguard’s device – was now malfunctioning, leaving it with no effective remedy other than to demand damages from Amazon, which Amazon refuses to pay. If Amazon’s illegal use does not cause device malfunctioning, GateGuard has no effective means of catching every instance of Amazon’s unauthorized conduct, resulting in unearned profits for Amazon.

+06:109. The reason that Amazon’s Key for Business can be so damaging to GateGuard’s intercom is that the Amazon device is installed directly onto the GateGuard circuit board or wiring that is connected directly to the circuit board, often “shorting” the devices and rendering them inoperable.

+07:110. Even though Amazon operates in great secrecy, GateGuard has been able to catch Amazon “red-handed” tampering with its intercom device.

+08:111. The image immediately below shows Amazon’s extender, a subway-ticket size device that needs to be inserted in or connected to an existing intercom or access control system:

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409:112. At one building in Manhattan, GateGuard discovered this “extender” device inserted and connected inside GateGuard’s intercom. The picture shown below is the back of a portion GateGuard’s intercom. The extender device has been wedged onto GateGuard’s blue circuit board; the green strip connecting the extender wires to a separate Amazon device can be seen on the bottom right and the grey “bubbles” that can be seen on the upper left-hand portion of the extender depicted above can be seen on the upper right-hand side of GateGuard’s case below: